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November 28, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: WideOpenWest Cleveland, LLC
WideOpenWest Illinois, LLC
WideOpenWest Michigan, LLC
WideOpenWest Ohio, LLC

E911 COMPLIANCE LETTER
WC Docket No. 05-196

Dear Ms. Dortch:

In accordance with the First Report and Order and Notice of Proposed Rulemaking, *In the Matter of IP-Enabled Services E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196 (Rel. June 3, 2005) (“*VoIP 911 Order*”) and the November 7, 2005 Public Notice issued by the Enforcement Bureau in the referenced docket, the following sets forth WOW!’s E911 Compliance Letter for each of the entities identified above.

911 SOLUTION

WOW! has partnered with Sprint to provide E911 service to all of its VoIP customers. WOW! relies on Sprint to manage all WOW! phone customer 911 records and call routing/connections including:

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- Updating the LEC-managed 911 database with the customer record as provided by WOW! during order provisioning.
- Managing all record fallout/reconciliation issues that may result during regular business procedures.
- Executing an annual audit against the LEC files to ensure all records are correct and resolve any discrepancies that may exist.
- Maintaining communications with local Public Safety Answering Points (“PSAP”) as required by the PSAP.
- Providing all 911 call routing and connectivity using the established Sprint wireline network.

WOW! provides 911 service in compliance with the rules established in the *VoIP 911 Order* to 100% of its base of customers.

- 911 Routing Information/Connectivity to Wireline E911 Network

Sprint provides a traditional E911 service for all of WOW!’s VoIP deployments. As a competitive local exchange carrier (CLEC), Sprint establishes interconnection trunks to the incumbent carriers in any rate center in which Sprint provides service. These interconnection trunks include connections to any selective routers serving that area which Sprint relies on to tandem the E911 calls to the PSAP, or direct connections to the PSAP should there be no selective router.

Sprint ensures complete redundancy and diversity at every point in the network including, but not limited to: transport diversity on different Sonet rings; completely redundant trunk groups assigned to redundant carrier facilities; default routing for any events of trunk group failure, ANI failure, ALI/SR database failure, no record found condition, or failure of the primary selective router tandem switch. Sprint supports either Signaling System 7 (SS7) or Multi-Frequency (MF) trunk signaling requirements to the selective router. E911 trunks are given priority in the Sprint network, managed 24 X 7, tracked for utilization, and augmented as necessary. Finally, Sprint’s operator support team has the ability to forward E911 calls to the appropriate PSAP should the subscriber accidentally dial the operator by mistake.

Sprint has the following selective routers interconnected in WOW! markets for WOW! customer 911 support:

Cleveland, OH – 1 router

Chicago, IL – 8 routers

Columbus, OH – 1 router

Detroit, MI – 2 routers

- Transmission of ANI and Registered Location Information

When WOW! enters a phone order on behalf of the customer, their registered location (“serviceable address”) is confirmed by the sales representative as part of the sales process. This is the address that is used for third party verification of the order and this address is sent to Sprint with the order via an e-bonded interface between WOW! and Sprint. Sprint processes the order and confirms the address is a valid Master Street Address Guide (“MSAG”) address using Sprint proprietary provisioning systems. Using CLEC industry standards and guidelines, Sprint updates the customer’s record (name, address and telephone number among other information) with the appropriate incumbent carrier 911 database. After the VoIP customer's service has been established, Sprint provides the E911 ALI record information to the PSAP's ALI database provider. The subscriber's E911 address is pre-validated against the MSAG. Changes to the subscriber’s information affecting 911 data are submitted to the PSAP's ALI database provider as updates to the record. Records failing to update in the ALI database are returned to Sprint for correction and resubmission to the database.

Sprint uses its traditional E911 interconnection trunks with the incumbent carriers to provide ANI and Registered Location to all answering points capable of receiving and processing the information.

100% of WOW! subscriber ANI and Registered Location information is being transmitted to answering points capable of receiving and processing the information. All answering points supporting WOW!’s serviceable areas are capable of receiving and processing the ANI and Registered Location information.

- Obtaining Initial Registered Location Information

As WOW! does not offer nomadic VoIP service, procedures for obtaining and verifying an address are similar to any CLEC provider.

When the customer contacts WOW! to purchase services, the customer address is located in the WOW! database of serviceable addresses. If the address is not found, additional research is done by WOW! with the customer to confirm the correct address is identified, serviceable and recorded in the database.

Once the order is submitted, Sprint performs MSAG validation on behalf of WOW! and any orders that do not pass MSAG validation are returned to WOW! for follow-up with the customer. Once an order has passed MSAG validation, the address is used by Sprint to update the ALI database provider as described above.

WOW! does not allow customers to self-install their VoIP service so the address is again confirmed when the technician is sent to the home to perform the service installation. While at the home, the technician verbally reminds the customer they are not to move their WOW! phone equipment without prior approval from WOW!. The customer signs an agreement stating they understand this limitation and will obtain prior approval from WOW! before moving their service equipment. Moreover, WOW! affixes to every advanced modem a sticker that includes a warning against moving the modem.

WOW! has Registered Location information for 100% of its customer base.

- Obtaining Updated Registered Location Information

As WOW! does not offer (or permit) a nomadic VoIP service, the customer is not given the ability to provide an updated Registered Location. If a customer is moving and desires to obtain WOW! phone service at the new location, the same procedure described above (see "Obtaining Initial Registered Location Information") is used and again a technician is sent to the new address to install WOW! services. Although the WOW! equipment can be transferred to the new location, the equipment will not be activated until a technician arrives at the home to perform the service installation.

- Technical Solution for Nomadic Subscribers

WOW! does not offer or support nomadic phone service at this time. Rather, WOW! offers only a fixed location VoIP service and consequently has no present need for an automatic detection mechanism that would enable WOW! to detect the location of a customer that is using the service nomadically.

If you have any questions with regard to this Compliance Letter, please contact the undersigned at 269-567-4200. Thank you.

Very truly yours,

Marlene H. Dortch
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WOW! Internet, Cable and Phone

D. Craig Martin
General Counsel

cc: Kathy Berthot, Deputy Chief, Spectrum Enforcement Division, Enforcement
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